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November 15, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222 - Mail Stop 1170
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex Parte Presentation - PR Docket 93-61
Automatic Vehicle Monitoring

Dear Mr. Caton:

On behalf of Pinpoint Communications, Inc., an original and one copy of this letter are submitted to provide notice of an *ex parte* presentation in the above-referenced rulemaking.

This afternoon, Charles Taylor, President of Pinpoint Communications, Inc., Dennis Eckart, Esq., of Arter & Hadden, and I met with Ruth Milkman, Senior Legal Advisor to Chairman Hundt, and John Logan, Deputy Director of the Office of Legislative and Intergovernmental Affairs, to discuss Pinpoint's views in this rulemaking. We also noted the willingness of Pinpoint and Part 15 interests to engage in testing and urged the Commission to recognize the need to include the results of such testing in the record before reaching a decision. A copy of the materials provided in the meeting is attached hereto.

Please contact me if there are any questions concerning this matter.

Respectfully,

David E. Hilliard

David E. Hilliard
Counsel for Pinpoint Communications, Inc.

Encl.
cc: Ruth Milkman
John E. Logan

Pinpoint Communications, Inc

- Founded in 1990
  - 50 employees (31 engineers and programmers)
- Developers of high capacity wide-area AVM
  - Designed to operate on a shared basis
  - Designed to consider the noisy environment of the 902-928 MHz band
  - Emphasis on capacity, cost, and functionality
    - 1,500 or more vehicle location per second - can locate in one second more vehicles than Teletrac, MobileVision, and Southwestern Bell combined times seven
    - Integral short messaging using a signal that provides the vehicle location
    - Does not require separate dedicated spectrum for forward links

- Holds licenses in 20 large markets
  - Commercial operations to begin in Dallas in 1995
  - Dallas site surveys and site procurement negotiations virtually completed
  - Ready to build out
  - Users waiting for service
  - Can operate in 8 MHz sub-band as licensed
    - Share on a co-primary basis with local-area AVM (eg tag systems)
    - Share on a time division basis with other wide-area AVM (eg Uniplex and others desiring entry)
    - Compatible with most Part 15 operation

Both AVM and Part 15 have been encouraged by the FCC

- 1974 Rules allocated 16 MHz for AVM plus 2 MHz (developmental)
- Millions of dollars have been invested by wide-area multilateration systems to address IVHS (now ITS) and public safety applications
- Competing technologies offer a choice of market driven solutions
- Opportunities for open entry under a shared allocation will bring about improvements
- 1985 and 1989 Part 15 Rule changes to allow high powered operation emphasized
  - Operation without causing interference to licensed services
  - Acceptance of interference from both other Part 15 devices and licensed stations
- Every Part 15 device is labeled to recognize these conditions
- Removal of the conditions would create unlicensed class of commercial revenue generating networks with rights superior to licensed services

The Part 15 hierarchy serves the needs of AVM and Part 15

- Current rules provide for
  - 26 MHz of spectrum for Part 15 commercial and consumer devices
  - 10 MHz of this spectrum can be used for high powered Part 15 commercial ubiquitous data and voice networks free from wide-area radiolocation networks
- If high powered Part 15 networks create interferences to low powered Part 15 devices, the low powered systems can seek safe haven inside the 16 MHz of AVM spectrum
- Provides protection from debilitating interference to AVM but AVM providers have an obligation to implement systems that exhibit significant robustness to tolerate most Part 15 emissions
- Should be coupled to a requirement for private dispute resolutions efforts before involving the Commission

TESTING

Pinpoint has long been willing to test with others

- Experimental system began operating in Washington in August 1993
- Tests with Amtech have proved compatibility with largest base of tag technologies, including Cal-Trans
- Long willing to test with Part 15 systems

Testing will help to build a better record

- Gain insight as to system to system interactions
- May reveal techniques for interference mitigation

With encouragement from the Commission staff and reasonable assurance that results will be considered, Pinpoint and Part 15 interests are prepared to conduct tests in December